

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MAUREEN MCCARTHY,

Plaintiff,

v.

BOSTON MEDICAL CENTER,

Defendant.

Civil Action No. 1:22-cv-11886-RGS

**DEFENDANT BOSTON MEDICAL CENTER'S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 12(c), Defendant Boston Medical Center (“Defendant” or “BMC”) hereby moves to dismiss Plaintiff Maureen McCarthy’s (“Plaintiff”) Complaint with prejudice. Plaintiff’s federal and state law claims of religious discrimination fail to plausibly allege that the beliefs which prevented her from receiving a COVID-19 vaccine are religious. In support of this Motion, Defendant relies upon its Memorandum of Law submitted herewith.

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, Defendant’s counsel conferred with Plaintiff’s counsel via e-mail on December 5, 2023, in a good faith attempt to narrow or resolve the matters raised in Defendant’s Motion.

REQUEST FOR HEARING

Defendant respectfully requests to be heard at oral argument on its Motion.

Respectfully submitted,

BOSTON MEDICAL CENTER,

By its attorneys,

/s/ Jeanette M. Piaget Figueroa

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CERTIFICATE OF SERVICE

This hereby certifies that on this ___ day of December 2023, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by electronic mail and first-class mail to non-registered participants.

/s/ Jeanette M. Piaget Figueroa

Jeanette M. Piaget Figueroa

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